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Attorneys for Defendant Kahle/Austin Foundation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UMG RECORDINGS, INC, CAPITOL
RECORDS, LLC, CONCORD BICYCLE
ASSETS, LLC, CMGI RECORDED MUSIC
ASSETS LLC, SONY MUSIC
ENTERTAINMENT, and ARISTA MUSIC

Plaintiffs,

v.

INTERNET ARCHIVE, BREWSTER
KAHLE, KAHLE/AUSTIN FOUNDATION,
GEORGE BLOOD, and GEORGE BLOOD,
L.P.

Defendants.

CASE NO. 3:23-CV-06522-MMC

**STIPULATION TO EXTEND TIME FOR
DEFENDANT KAHLE/AUSTIN FOUNDATION
TO RESPOND TO AMENDED COMPLAINT**

Judge: Hon. Maxine M. Chesney
Courtroom: No. 7 (19th Floor)

1 WHEREAS, Plaintiffs UMG Recordings, Inc. Capitol Records, LLC, Concord Bicycle Assets,
2 LLC, CMGI Recorded Music Assets LLC, Sony Music Entertainment, and Arista Music (collectively,
3 Plaintiffs) filed their amended complaint against Defendant Kahle-Austin Foundation (the Foundation) in
4 the above-captioned matter on March 12, 2024 (ECF 95);

5 WHEREAS, the Foundation's deadline to answer or otherwise respond to the amended complaint
6 currently is May 29, 2024 (based on the date the Court denied the Foundation's motion to dismiss, which
7 is May 15, 2024);

8 WHEREAS, Plaintiffs have agreed to extend the Foundation's time to answer to the amended
9 complaint by 2 days, to May 31, 2024;

10 WHEREAS, no other case deadlines are impacted by this stipulation and this stipulation does not
11 and will not alter the date of any event or deadline already fixed by the Court;

12 WHEREAS this is the first extension the Foundation has sought concerning the deadline to file an
13 answer;

14 WHEREAS, Plaintiffs and the Foundation stipulate that the execution of this stipulation is not a
15 waiver of any claims or defenses these parties may otherwise have, and all such claims and defenses are
16 expressly reserved by Plaintiffs and the Foundation; and

17 NOW, THEREFORE, under Civil Local Rule 6-1(a) Plaintiffs and the Foundation hereby stipulate
18 that the Foundation's deadline to answer the complaint is May 31, 2024.

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20 IT IS SO STIPULATED.
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1 DATED: May 29, 2024

Respectfully submitted,

2 CONRAD | METLITZKY | KANE LLP

3
4 /s/ Jessica Lanier

5 MARK R. CONRAD

6 JESSICA E. LANIER

7 *Attorneys for Defendant Kahle/Austin Foundation*

8 DATED: May 29, 2024

Respectfully submitted,

9 OPPENHEIM & ZEBRAK LLP

10
11 /s/ Corey Miller

12 MATTHEW JAN OPPENHEIM

13 COREY MILLER

14 DANA E. TINELLI

15 *Attorneys for Plaintiffs*

16 **ATTESTATION**

17 Under Civil Local Rule 5-1(h)(3), I hereby attest that each of the other signatories have concurred
18 in the filing of this document.

19
20 DATED: May 29, 2024

/s/ Jessica E. Lanier

21 Jessica E. Lanier